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10 *Direct Purchaser Plaintiffs*

11
12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**
15

16
17 IN RE: CATHODE RAY TUBE (CRT)
18 ANTITRUST LITIGATION

Master File No. 07-5944-SC

MDL No. 1917

19
20 This Document Relates To:

21 *Crago, d/b/a Dash Computers, Inc., et al. v.*
22 *Mitsubishi Electric Corporation, et al., Case*
23 *No. 14-CV-2058 (SC).*

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF MOTION TO
DISSEMINATE NOTICE OF DIRECT
PURCHASER CLASS CERTIFICATION**

Date: September 11, 2015

Time: 10:00 a.m.

Judge: Honorable Samuel Conti

Ctrm: 1, 17th floor

1 I, R. Alexander Saveri, declare:

2 1. I am the managing partner of Saveri & Saveri, Inc., which the Court has appointed as
3 lead counsel on behalf of the Direct Purchaser Plaintiffs (“Plaintiffs” or “DPPs”) in this action. I
4 have been involved in almost every aspect of this case since its inception. I submit this declaration
5 in support of the Motion to Disseminate Notice of Direct Purchaser Class Certification. Except as
6 otherwise noted, I make this declaration of my own personal knowledge, and if called upon to do
7 so, could and would testify competently to the facts contained herein.

8 2. Attached hereto as Exhibit 1 is the Proposed Long-Form Notice.

9 3. Attached hereto as Exhibit 2 is the Proposed Summary Notice.

10 4. The notice program is similar to the ones implemented in other direct purchaser
11 antitrust class actions—namely direct notice to class members whose addresses can be reasonably
12 obtained along with publication once in the national editions of the *Wall Street Journal* and the *New*
13 *York Times*, together with appropriate listings on the Internet. The notice program is the same as
14 the notice programs approved by the Court with regard to the settlement with Thomson, nearly the
15 same as the notice programs for the settlements with Chunghwa, Philips, Panasonic, LG, Toshiba,
16 Hitachi, and Samsung SDI,¹ and similar to those approved by courts in this District and employed
17 in the direct purchaser *DRAM*, *SRAM*, *CRT* and *LCD* class actions.

18 I declare under penalty of perjury under the laws of the United States that the foregoing is
19 true and correct. Executed on July 31, 2015 at San Francisco, California.

20 /s/ R. Alexander Saveri

21 R. Alexander Saveri

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23
24
25
26 ¹ Pursuant to the Court’s Order Re: Preliminary Approval of Class Action Settlements with
27 Thomson and TDA Defendants (Mar. 26, 2015) (Dkt. No. 3810), notice of the Thomson settlement
28 was published in two newspapers, rather than one. This is the only difference between the notice
plan proposed herein and the notice plans for settlements with Chunghwa, Philips, Panasonic, LG,
Toshiba, Hitachi, and Samsung SDI.

EXHIBIT 1

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

If You Bought A Cathode Ray Tube Product, A Class Action Ruling May Affect You.

Cathode Ray Tube (CRT) Products include Cathode Ray Tubes and finished products that contain a Cathode Ray Tube such as Televisions and Computer Monitors.

Important Date	
Deadline to Request Exclusion from Litigated Class	XXXXXX, XX, 2015

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

- A class action lawsuit that includes direct purchasers of CRT Products is currently pending.
- Plaintiffs claim that Defendants (listed below) and co-conspirators engaged in an unlawful conspiracy to fix, raise, maintain or stabilize the prices of Cathode Ray Tubes. Plaintiffs further claim that direct purchasers of televisions and monitors that contain a cathode ray tube from the Defendants may recover for the effect that the cathode ray tube conspiracy had on the prices of televisions and monitors. Plaintiffs allege that, as a result of the unlawful conspiracy involving cathode ray tubes, they and other direct purchasers paid more for CRT Products than they would have paid absent the conspiracy. Defendants deny Plaintiffs' claims.
- On July 8, 2015, the District Court certified a direct purchaser plaintiff class. A copy of the Order granting class certification is available on the class website at www.CRTDirectPurchaserAntitrustSettlement.com. The class consists of "All persons and entities who, between March 1, 1995 and November 25, 2007, directly purchased a CRT Product in the United States from any Defendant or any subsidiary or affiliate thereof, or any co-conspirator or any subsidiary or affiliate thereof. Excluded from the class are defendants, their parent companies, subsidiaries or affiliates, any co-conspirators, all governmental entities, and any judges or justices assigned to hear any aspect of this action."
- Your legal rights will be affected whether you act or don't act. This Notice includes information on the certified class and the continuing lawsuit. Please read the entire Notice carefully.
- You may exclude yourself from the class by submitting a request for exclusion by **XXXXXX, XX, 2015**

Your rights are explained in this notice.

**For More Information: Call 1-877-224-3063 or Visit
www.CRTDirectPurchaserAntitrustSettlement.com**

WHAT THIS NOTICE CONTAINS

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BASIC INFORMATION

1. Why did I get this notice?

You or your company may have directly purchased Cathode Ray Tubes (CRTs) or certain products containing those tubes between March 1, 1995 and November 25, 2007. A direct purchaser is a person or business who bought a CRT, or a television or computer monitor containing a CRT directly from one or more of the Defendants, co-conspirators, affiliates, or subsidiaries themselves, as opposed to an intermediary (such as a retail store).

You have the right to know about the litigation and about your legal rights and options before you decide whether to request exclusion from the litigated class.

The notice explains the litigation and your legal rights.

The Court in charge of the case is the United States District Court for the Northern District of California, and the case is called *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917. The people who sued are called Plaintiffs and the companies they sued are called Defendants.

2. Who are the Defendant and Co-Conspirator companies?

The Defendants and alleged Co-Conspirators are: Beijing-Matsushita Color CRT Company, Ltd.; Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.; Chunghwa Picture Tubes, Ltd.; Daewoo Electronics Corporation (f/k/a Daewoo Electronics Company, Ltd.); Daewoo International Corporation; Daewoo-Orion Societe Anonyme; Hitachi America, Ltd.; Hitachi Asia, Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA), Inc.; Hitachi Ltd.; Irico Display Devices Co., Ltd.; Irico Group Corporation; Irico Group Electronics Co., Ltd.; Koninklijke Philips Electronics N.V. (n/k/a Koninklijke Philips N.V.); LG Electronics Taiwan Taipei Co., Ltd.; LG Electronics USA, Inc.; LG Electronics, Inc.; LP Displays International, Ltd.; Matsushita Electronic Corporation (Malaysia) Sdn Bhd.; Mitsubishi Electric Corporation; Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric & Electronics USA, Inc.); Mitsubishi Electric Visual Solutions America, Inc. (f/k/a Mitsubishi Digital Electronics America Inc. (f/k/a Mitsubishi Consumer Electronics America, Inc.)); MT Picture Display Co., Ltd. (f/k/a Matsushita Toshiba Picture Display Co., Ltd.); Orion Electric Co.; Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.); Panasonic Corporation of North America; Philips Consumer Electronics Co.; Philips da Amazonia Industria Electronica Ltda. (n/k/a Philips do Brasil, Ltda.); Philips Electronics Industries (Taiwan), Ltd. (n/k/a Philips Taiwan Limited); Philips Electronics Industries Ltd.; Philips Electronics North America Corporation; Samsung Electronics America, Inc.; Samsung SDI (Malaysia) Sdn. Bhd.; Samsung SDI Brasil Ltda.; Samsung SDI Co., Ltd. (f/k/a Samsung Display Device Company); Samsung SDI Mexico S.A. de C.V.; Shenzhen Samsung SDI Co. Ltd.; Shenzhen SEG Hitachi Color Display Devices, Ltd.; Technicolor SA (f/k/a Thomson SA); Technicolor USA, Inc. (f/k/a Thomson Consumer

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www.CRTDirectPurchaserAntitrustSettlement.com**

Electronics, Inc.); Technologies Displays Americas LLC (f/k/a Thomson Displays Americas LLC); Thai CRT Company, Ltd.; Tianjin Samsung SDI Co., Ltd.; Toshiba America Consumer Products LLC; Toshiba America Consumer Products, Inc.; Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc.; Toshiba America, Inc.; Toshiba Corporation; Toshiba Display Devices (Thailand) Company, Ltd.; and Videocon Industries, Ltd.

3. Who are the affiliates and subsidiaries mentioned in the class definition?

The “affiliates and subsidiaries” are: Chunghwa Picture Tubes Fuzhou; Chunghwa Picture Tubes Taiwan; Daewoo Electronics America, Inc.; Hitachi Electronic Display (USA); Hitachi High-Technologies America, Inc. (f/k/a Nissei Sangyo America, Ltd.); Hitachi High-Technologies Corporation (f/k/a Nissei Sangyo Co., Ltd.); LG Electronics Service Europe Netherlands B.V.; LG Electronics Wales Ltd.; LG Philips Displays; LG.Philips Displays Brasil Ltda.; LG.Philips Displays Holding B.V.; LG.Philips Displays International Ltd.; LG.Philips Displays Korea Co. Ltd.; LG.Philips Displays Mexico SA de CV; LG.Philips Displays USA Inc.; MELCO Display Devices Mexico, S.A. de C.V.; Mitsubishi Display Devices America, Inc.; Mitsubishi Electric Sales America, Inc.; Mitsubishi Electric US Holdings, Inc.; Mitsubishi Electronics America, Inc.; Mitsubishi Electronics Industries Canada, Inc.; MT Picture Display Corporation of America (New York); MT Picture Display Corporation of America (Ohio); NEC-Mitsubishi Electric Visual Systems Corporation; NEC-Mitsubishi Electronics Display of America, Inc.; NM Visual Systems de Mexico S. A. de C.V.; Orion Electric Components, Co., Ltd.; Orion Engineering & Service, Inc.; Orion Mexicana, SA de CV; P.T. Tosummit Electronic Devices Indonesia; Panasonic AVC Networks America; Panasonic Sikoku Electronics Corporation of America; PCB Integrated Manufacturing System, S.A. de C.V.; Philips Holding USA Inc.; PT.MT Picture Display Indonesia; Samsung Electronics Co., Ltd.; Samsung SDI (Hong Kong), Ltd.; Samsung SDI America, Inc.; Samsung SDI Co. Ltd. (Korea); Samsung SDI Germany GmbH; Samsung SDI Hungary Ltd.; Samtel Color, Ltd.; Tatung Company of America, Inc.; TCL International Holdings Ltd.; TCL Thomson Electronics Corporation; Technologies Displays Mexicana, S.A. de C.V. (f/k/a Thomson Displays Mexicana, S.A. de C.V.); Tianjin Samsung SDI Co. Ltd.; TTE Technology, Inc.; and Zenith Electronics Corporation (a/k/a Zenith Electronics LLC).

4. What is this lawsuit about?

The lawsuit alleges that Defendants and Co-Conspirators conspired to raise and fix the prices of CRTs and the CRTs contained in certain finished products for over ten years, resulting in overcharges to direct purchasers of those CRTs and certain finished products containing CRTs. The complaint describes how the Defendants and Co-Conspirators allegedly violated the U.S. antitrust laws by establishing a global cartel that set artificially high prices for, and restricted the supply of CRTs and the televisions and monitors that contained them. Defendants deny Plaintiffs’ allegations. The Court has not decided who is right.

5. What is a Cathode Ray Tube Product?

For the purposes of the class definition, Cathode Ray Tube Products (or “CRT Product”) means Cathode Ray Tubes of any type (e.g. color display tubes and color picture tubes) and finished products which contain Cathode Ray Tubes, such as Televisions and Computer Monitors.

6. What is a class action?

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All these people are members of the class, except for those who exclude themselves from the class.

If the Plaintiffs obtain money or benefits as a result of a trial or future settlement, you will be notified about those settlements at that time. Important information about the case will be posted on the website, **www.CRTDirectPurchaserAntitrustSettlement.com** as it becomes available. Please check the website to be kept informed about any future developments.

THE LITIGATED CLASS

7. How do I know if I’m part of the Litigated Class?

As a result of a motion filed by the plaintiffs, on July 8, 2015, the District Court certified a class of Direct Purchaser Plaintiffs (the “Litigated Class”). The Litigated Class includes:

All persons and entities who, between March 1, 1995 and November 25, 2007, directly purchased a CRT Product in the United States from any Defendant or any subsidiary or affiliate thereof, or any co-conspirator or any subsidiary or affiliate thereof. Excluded from the class are defendants, their parent companies, subsidiaries or affiliates, any co-conspirators, all governmental entities, and any judges or justices assigned to hear any aspect of this action.

8. What are my rights with regard to the Litigated Class?

Remain in the Litigated Class: If you wish to remain a member of the Litigated Class you do not need to take any action at this time.

If you remain a class member, you will be bound by the District Court’s rulings in the lawsuit, including any final judgment.

Get out of the Litigated Class: If you wish to keep your rights to individually sue the Defendants about the claims in this case, you must exclude yourself from the Litigated Class. You will not get any money from any future judgment awarded to the class if you exclude yourself from the Litigated Class.

To exclude yourself from the Litigated Class, you must send a letter that includes the following:

**For More Information: Call 1-877-224-3063 or Visit
www.CRTDirectPurchaserAntitrustSettlement.com**

- Your name, address and telephone number,
- A statement saying that you want to be excluded from *In re Cathode Ray Tube (CRT) Antitrust Litigation*, MDL No. 1917, Litigated Class; and
- Your signature.

You must mail your exclusion request, postmarked no later than _____, to:

CRT Direct Settlement
P.O. Box 808003
Petaluma, CA 94975

9. What am I giving up to stay in the Litigated Class?

Unless you exclude yourself from the Settlement Class, you can't sue the Defendants, or be part of any other lawsuit against these Defendants about the legal issues in this case. It also means that all of the decisions by the Court (including any future class judgment) will bind you.

10. Who are the Class Representatives?

The Class Representatives are: Arch Electronics, Inc.; Crago, d/b/a Dash Computers, Inc.; Meijer, Inc. and Meijer Distribution, Inc.; Nathan Muchnick, Inc.; Princeton Display Technologies, Inc.; Radio & TV Equipment, Inc.; Studio Spectrum, Inc.; and Wettstein and Sons, Inc., d/b/a Wettstein's

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in the case?

Yes. The Court has appointed the law firm of Saveri & Saveri, Inc. to represent you as Lead Counsel. You do not have to pay Lead Counsel. If you want to be represented by your own lawyers, and have that lawyer appear in court for you in this case, you may hire one at your own expense.

GETTING MORE INFORMATION

12. How do I get more information?

This Notice summarizes the lawsuit. You can get more information about the lawsuit (including relevant case documents) at **www.CRTDirectPurchaserAntitrustSettlement.com**, by calling 1-877-224-3063, or writing to CRT Direct Settlement, P.O. Box 808003, Petaluma, CA 94975. Please do not contact the Court about this case.

Dated: _____

BY ORDER OF THE COURT

**For More Information: Call 1-877-224-3063 or Visit
www.CRTDirectPurchaserAntitrustSettlement.com**

EXHIBIT 2

LEGAL NOTICE**If You Bought A Cathode Ray Tube (“CRT”) or CRT Product, A Class Action May Affect You.****CRT Products include Televisions or Computer Monitors that contain Cathode Ray Tubes**

On July 8, 2015, the District Court certified a direct purchaser plaintiff class. A copy of the Order granting class certification is available on the class website at www.CRTDirectPurchaserAntitrustSettlement.com. The class consists of “All persons and entities who, between March 1, 1995 and November 25, 2007, directly purchased a CRT Product in the United States from any Defendant or any subsidiary or affiliate thereof, or any co-conspirator or any subsidiary or affiliate thereof. Excluded from the class are defendants, their parent companies, subsidiaries or affiliates, any co-conspirators, all governmental entities, and any judges or justices assigned to hear any aspect of this action.”

What is this lawsuit about?

The lawsuit alleges that Defendants and Co-Conspirators engaged in an unlawful conspiracy to fix, raise, maintain or stabilize the prices of CRTs. Plaintiffs further claim that direct purchasers of televisions and monitors that contain a cathode ray tube from the Defendants may recover for the effect that the cathode ray tube conspiracy had on the prices of televisions and monitors. Plaintiffs allege that, as result of the unlawful conspiracy, they and other direct purchasers paid more for CRT Products than they would have absent the conspiracy. Defendants deny Plaintiffs’ claims.

Who are the Defendant and Co-Conspirator companies?

Beijing-Matsushita Color CRT Company, Ltd.; Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.; Chunghwa Picture Tubes, Ltd.; Daewoo Electronics Corporation (f/k/a Daewoo Electronics Company, Ltd.); Daewoo International Corporation; Daewoo-Orion Societe Anonyme; Hitachi America, Ltd.; Hitachi Asia, Ltd.; Hitachi Displays, Ltd.; Hitachi Electronic Devices (USA), Inc.; Hitachi Ltd.; Irico Display Devices Co., Ltd.; Irico Group Corporation; Irico Group Electronics Co., Ltd.; Koninklijke Philips Electronics N.V. (n/k/a Koninklijke Philips N.V.); LG Electronics Taiwan Taipei Co., Ltd.; LG Electronics USA, Inc.; LG Electronics, Inc.; LP Displays International, Ltd.; Matsushita Electronic Corporation (Malaysia) Sdn Bhd.; Mitsubishi Electric Corporation; Mitsubishi Electric US, Inc. (f/k/a Mitsubishi Electric & Electronics USA, Inc.); Mitsubishi Electric Visual Solutions America, Inc. (f/k/a Mitsubishi Digital Electronics America Inc. (f/k/a Mitsubishi Consumer Electronics America, Inc.)); MT Picture Display Co., Ltd. (f/k/a Matsushita Toshiba Picture Display Co., Ltd.); Orion Electric Co.; Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.); Panasonic Corporation of North America; Philips Consumer Electronics Co.; Philips da Amazonia Industria Electronica Ltda. (n/k/a Philips do Brasil, Ltda.); Philips Electronics Industries (Taiwan), Ltd. (n/k/a Philips Taiwan Limited); Philips Electronics Industries Ltd.; Philips Electronics North America Corporation; Samsung Electronics America, Inc.; Samsung SDI (Malaysia) Sdn. Bhd.; Samsung SDI Brasil Ltda.; Samsung SDI Co., Ltd. (f/k/a Samsung Display Device Company); Samsung SDI Mexico S.A. de C.V.; Shenzhen Samsung SDI Co. Ltd.; Shenzhen SEG Hitachi Color Display Devices, Ltd.; Technicolor SA (f/k/a Thomson SA); Technicolor USA, Inc. (f/k/a Thomson Consumer Electronics, Inc.); Technologies Displays

Americas LLC (f/k/a Thomson Displays Americas LLC); Thai CRT Company, Ltd.; Tianjin Samsung SDI Co., Ltd.; Toshiba America Consumer Products LLC; Toshiba America Consumer Products, Inc.; Toshiba America Electronic Components, Inc.; Toshiba America Information Systems, Inc.; Toshiba America, Inc.; Toshiba Corporation; Toshiba Display Devices (Thailand) Company, Ltd.; and Videocon Industries, Ltd.

Who are the affiliates and subsidiaries mentioned in the class definition?

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What are my rights?

If you wish to remain a member of the Litigated Class you do not need to take any action at this time. If you do not want to be legally bound by future judgments with regard to the Litigated Class, you must exclude yourself in writing by _____, or you will not be able to sue, or continue to sue, the remaining Defendants about the legal claims in this case.

This is a Summary Notice. For more details, call toll free 1-877-224-3063, visit www.CRTDirectPurchaserAntitrustSettlement.com, or write to CRT Direct Settlement, P.O. Box 808003, Petaluma, CA94975.